

# **Exhibit E**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC.; *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; *et al.*,

*Defendants.*

Civil Action No.

**DECLARATION OF BRUCE BOE**

I, Bruce Boe,<sup>1</sup> pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Bruce Boe. I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for Temporary Restraining Order. I am over 18 years old, have personal knowledge of the facts set forth in this Declaration, and would testify competently to those facts if called as a witness.

2. I am a Plaintiff in this action. I am bringing claims on behalf of myself and as the parent and next friend of my daughter, Bella Boe.

3. I live in New York City with my spouse and my daughter, Bella Boe, who is 12 years old and in seventh grade.

4. We are members of PFLAG.

5. My daughter, Bella Boe, is a strong, artistic, and happy child. Her favorite subjects in school are Art and Spanish. She particularly loves drawing cityscapes and designing clothing,

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<sup>1</sup> Bruce Boe and Bella Boe are pseudonyms. My family is proceeding under pseudonym to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

and she has even started making her own clothing. She has wonderful friends, including a group of friends she has had since kindergarten.

6. Bella is transgender. She was assigned a male sex at birth, but she has indicated she felt differently since she was a toddler. She would tell us that she did not want to have a beard or body hair when she grew up, and that she wanted long hair instead. My spouse and I did not impose any gendered expectations on her. We told her that we would support her no matter what and that she did not have to have a beard or body hair if she did not want to.

7. Bella had been bullied in sixth grade, especially after she dyed her hair and started expressing her gender differently. Her classmates repeatedly called her slurs that are often used to denigrate the LGBTQ+ community. She told us that her school did not feel like a safe place to be herself: she was bullied walking to and from school and in the hallways, and she started missing school to avoid the bullying. One student grabbed Bella, called her trans, and told her to kill herself. We ended up transferring Bella to a new school at the end of sixth grade, where she is able to live fully as herself and begin to socially transition outside of our home.

8. Bella's new school has been a wonderful place for her. I have seen how her ability to be herself at school has dramatically impacted her wellbeing.

9. In the summer of 2024, Bella bought her first dress. She told us she felt "really good" in it and was so excited to feel so happy. In August of 2024, she told us she identifies as a girl. The impact of her social transition on her social and emotional wellbeing was immediate. My spouse and I could tell that she was happy, which in turn made us happy.

10. Eventually, we made some appointments with the Transgender Youth Health Program at NYU Langone Health. She had already been seeing a doctor at NYU for other conditions, so we thought that it would be easiest to continue her care at NYU.

11. We had our first appointment to learn about the options for medical care for Bella in November 2024, regarding a potential puberty blocker, and we had another follow-up appointment in early January 2025. At these appointments, the provider explained that one option we could pursue was a puberty-blocking implant. The doctors asked extensive questions about what Bella wanted and made sure to explain how the puberty blockers work, including that they do not do anything except temporarily pause puberty. She has also been diagnosed with gender dysphoria.

12. After much discussion and consultation as a family and with Bella's doctor and therapist, we understood that this was an option that we and Bella wanted to pursue, to give her time—we did not want to rush any important medical decisions. We proceeded with submitting the relevant paperwork to our insurance company, which approved it. We then scheduled an intake with the appropriate unit at NYU so that we could make an appointment for the puberty-blocking implant.

13. On January 28, 2025, the White House issued an Executive Order entitled "Protecting Children from Chemical and Surgical Mutilation" ("Executive Order").

14. The same day, my spouse and I called NYU, and they refused to schedule an intake appointment. Even after we explained that our insurance had already approved the implant and that the NYU unit was in network, they told us they were reevaluating their policies on gender-affirming care because of the new administration.

15. Later that day, the NYU unit scheduled an intake appointment for Bella for 9:00 am on January 29, 2025. We took Bella to the appointment, where the clinician explained the procedure, and the staff told us they would schedule the implant for potentially the next day.

16. But as the day progressed and we did not see an appointment scheduled, I called NYU, which told me that they had shut down all new procedures and prescriptions related to gender-affirming care for patients under 19.

17. Bella has already started puberty. Without a puberty blocker, I am scared Bella will experience distress and anxiety, and I am terrified that the positive changes in her mental health since switching schools will be reversed.

18. When I told Bella that NYU had canceled all future appointments related to gender-affirming care for patients under age 19, Bella was angry, fearful, and worried. She is scared about what she might look like in the future if she is unable to get the care that she needs because she is scared to look like a boy. Being forced to undergo masculine puberty and having facial or body hair would make her feel different, isolated, and like a person she does not want to be, and she would not feel like herself.

19. I am devastated that the White House has sought to prevent my child from accessing the health care that will allow her to continue to be her authentic self. Before the Executive Order, we were confident that we would be able to secure for Bella the care that she needs. But because the Executive Order has caused NYU and other providers to halt the provision of this care, we are scared that we have no way of getting Bella the care she requires.

20. Bella's health and safety are more important to me than anything else. I have watched Bella bloom into a happy and creative young person, and I am scared that she will regress and become depressed again if she cannot access the care she needs now. I do not want to see her prevented from accessing the care that helps her be who she is.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this 2nd day of February 2025.

*Bruce Boe*

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Bruce Boe